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DOCKET FILE COPY ORIGINAL

November 30, 2007

VIA HAND DELIVERY

Mrs. Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc.
236 Massachusetts Avenue N.E.; Suite 110
Washington, DC 20002

FILED/ACCEPTED
NOV 30 2007

Federal Communications Commission
Office of the Secretary

Re: CC Docket No. 00-257 Section 64.1120(e)
Notification for ITS Telecommunications Systems, Inc.

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI") hereby provides notice on behalf of ITS Telecommunications Systems, Inc. ("ITS") pursuant to Section 64.1120(e) of the Commissions Rules of the pending transfer of the interexchange subscriber base of Arrow Communications, Inc. d/b/a ACI to ITS. In accordance with the requirements of Section 64.1120(e), JSI submits the following information on behalf of ITS.

1. Names of parties to transaction:

Transferring Carrier: Arrow Communications, Inc. d/b/a ACI. ("ACI").

Acquiring Carrier: ITS Telecommunications Systems, Inc. ("ITS")

ACI and ITS are affiliates as defined by Section 3(1) of the Communications Act, as Amended. 47 U.S.C. § 153(1).

2. Types of telecommunications services to be affected:

Interstate, international and intrastate interexchange services (switchless resale).

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List ABCDE

Echelon Building II, Suite 200
9430 Research Blvd.
Austin, Texas 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve
Eagan, Minnesota 5512
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Building B-3, Suite 200
Atlanta, Georgia 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, Utah 84010
phone: 801-294-4576, fax: 801-294-5124

3. Date of transfer:

January 1, 2008.

4. Certificate of compliance:

Attached hereto as Exhibit A is ITS' certification of compliance with the requirement to provide advance subscriber notice in accordance with §64.1120(e)(3), with the obligations specified in that notice, and with other statutory and Commission requirements that apply to this streamlined process.

5. Copy of notice sent to affected subscribers:

Attached hereto as Exhibit B is the notice sent by ITS to affected customers.

An extra copy is being presented to Natek, Inc. for the purpose of date-stamping and return by hand.

Please direct any questions or inquiries regarding this matter to the undersigned.

Respectfully submitted,



Scott Duncan,
Staff Director-Regulatory Affairs
John Staurulakis, Inc.
sduncan@jsitel.com
301-459-7590

Consultant for ITS Telecommunications Systems, Inc.

cc: ITS Telecommunications Systems, Inc.

John Staurulakis, Inc.

ITS TELECOMMUNICATIONS SYSTEMS, INC.

15925 S.W. Warfield Boulevard, P.O. Box 277

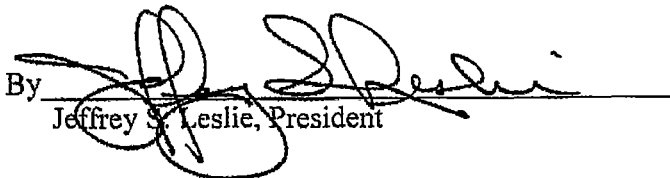
Indiantown, Florida 34956

772 597-3330

CERTIFICATION

ITS Telecommunications Systems, Inc. certifies that it has complied with all requirements of 47 C.F.R. 64.1 120(e) including providing the advance subscriber notice in accordance with 47 C.F.R. 64.1 120(e)(3), with the obligations specified in that notice, and with other statutory and Commission requirements that apply to the streamlined process for acquisition of the subscriber base of another telecommunications carrier.

ITS Telecommunications Systems, Inc.

By 
Jeffrey S. Leslie, President

Date November 30, 2007



ITS TELECOMMUNICATIONS SYSTEMS, INC.

15925 SW Warfield Blvd. , P. O. Box 277

Indiantown, Florida 34956

772-597-2111

November 28, 2007

Dear Valued Customer:

ITS Telecommunications Systems, Inc. ("ITS"), in order to more efficiently and better serve its valued customers, will assume effective January 1, 2008 direct responsibility for the provision of long distance service to you currently provided by our affiliate, ACI and billed on the ITS bill. As part of this change, ITS will rebrand your ACI long distance service as "ITS Telecommunications." This change does not affect your services or rates.

You may choose another carrier for your long distance telephone service, subject to any termination restrictions in your current contract. Unless you elect to change your carrier, no action is required by you and you will continue to receive the same, excellent services without interruption. You will not be charged any carrier-change fees as a result of any changes made prior to January 1, 2008 or for the change in provider name being made by ITS.

If you have a freeze on your preferred long distance carrier, that freeze will be automatically lifted on January 1, 2008 in order to complete the change. If you would like to re-apply this freeze, please contact our Customer Service at the numbers provided below after January 1, 2008 to re-apply the freeze.

Please note that any "freeze" you have placed on your existing telephone lines to prevent unauthorized transfer to another long distance carrier will be over-ridden for purposes of this transaction, and will need to be reinstated by you after the transfer is complete. Providing excellent and uninterrupted service to our valued customers continues to be our top priority. **Your existing rates, configuration and billing will remain the same, with no changes.** The ITS Customer Service number is (772) 597-2111 or toll-free at 1-888-888-6242. Please use this number for any questions or concerns you may have prior to or during the consolidation period.